

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

Civil Action No. 1:06-cv-00726-JJF

CHI MEI OPTOELECTRONICS
CORPORATION; CHI MEI
OPTOELECTRONICS USA, INC.; AU
OPTRONICS CORPORATION; AU
OPTRONICS CORPORATION AMERICA;
TATUNG COMPANY; TATUNG COMPANY
OF AMERICA, INC.; AND VIEWSONIC
CORPORATION,

Defendants.

**DECLARATION OF ASHLEY B. STITZER IN SUPPORT OF
PLAINTIFF LG.PHILIPS LCD CO., LTD.'S ANSWERING BRIEF IN
OPPOSITION TO DEFENDANTS TATUNG COMPANY'S
AND TATUNG COMPANY OF AMERICA'S
RENEWED MOTION FOR A MORE DEFINITE STATEMENT**

I, Ashley B. Stitzer, hereby depose and state:

1. I am an attorney with The Bayard Firm, which has an office at 222 Delaware Avenue, 9th Floor, Wilmington, Delaware 19899-5130. The Bayard Firm is counsel for Plaintiff LG.Philips LCD Co., LTD. ("LG.Philips") with respect to the instant action. I am admitted to the Bar of the State of Delaware.

2. I make this Declaration in support of LG.Philips's Answering Brief in Opposition to Defendants Tatung Company's and Tatung Company of America's Renewed Motion for a More Definite Statement, filed contemporaneously with this Declaration. I am fully familiar with the facts contained therein and fully familiar with the documents described herein.

3. Attached to this Declaration as **Exhibit 1** is a true and correct copy of excerpts from the civil docket for the case brought by LG.Philips against Defendants Tatung Company and Tatung Company of America (“the Tatung Defendants”) on December 1, 2006 in the U.S. District Court for the District of Delaware, Civ. A. No. 06-00726. These docket excerpts were printed on June 22, 2007 from the PACER website for the District of Delaware.

4. Attached to this Declaration as **Exhibit 2** is a true and correct copy of the Standing Order regarding the procedure for filing non-case dispositive motions in patent cases, issued by the Hon. Joseph J. Farnan, Jr. of the U.S. District Court for the District of Delaware on December 15, 2006.

5. Attached to this Declaration as **Exhibit 3** is a true and correct copy of excerpts from the civil docket for the case brought by LG.Philips against the Tatung Defendants on December 1, 2006 in the U.S. District Court for the District of Delaware, Civ. A. No. 06-00726. These docket excerpts were printed on June 22, 2007 from the PACER website for the District of Delaware.

6. Attached to this Declaration as **Exhibit 4** is a true and correct copy of excerpts from the civil docket for the case brought by LG.Philips against the Tatung Defendants on December 1, 2006 in the U.S. District Court for the District of Delaware, Civ. A. No. 06-00726. These docket excerpts were printed on June 22, 2007 from the PACER website for the District of Delaware.

7. Attached to this Declaration as **Exhibit 5** is a true and correct copy of correspondence from Mr. Richard D. Kirk, counsel for LG.Philips, to counsel for Defendants in this case, dated May 22, 2007.

8. Attached to this Declaration as **Exhibit 6** is a true and correct copy of the complaint for patent infringement filed by LG.Philips against the Tatung Defendants on August 29, 2002 in the U.S. District Court for the Central District of California, Civ. A. No. 02-6775. This complaint alleges, *inter alia*, infringement of United States Patent No. 4,624,737 and United States Patent No. 5,825,449. The exhibit does not include the attachments to the complaint.

9. Attached to this Declaration as **Exhibit 7** is a true and correct copy of the complaint for patent infringement filed by LG.Philips against the Tatung Defendants on May 13, 2005 in the U.S. District Court for the District of Delaware, Civ. A. No. 05-00292. This complaint alleges, *inter alia*, infringement of United States Patent No. 5,019,002. The exhibit does not include the attachments to the complaint.

10. Attached to this Declaration as **Exhibit 8** is a true and correct copy of excerpts from the civil docket for the case brought by LG.Philips against the Tatung Defendants on August 29, 2002 in the U.S. District Court for the Central District of California, Civ. A. No. 02-6775. These docket excerpts were printed on June 20, 2007 from the PACER website for the Central District of California.

11. Attached to this Declaration as **Exhibit 9** is a true and correct copy of excerpts from the civil docket for the case brought by LG.Philips against the Tatung Defendants on May 13, 2005 in the U.S. District Court for the District of Delaware, Civ. A. No. 05-00292. These docket excerpts were printed on June 27, 2007 from the PACER website for the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of June, 2007.

June 27, 2007

THE BAYARD FIRM

/s/ Ashley B. Stitzer (as3891)
Richard D. Kirk (#0922)
Ashley B. Stitzer (#3891)
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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 27, 2007, she served the foregoing documents by email and by hand upon the following counsel:

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The undersigned counsel further certifies that, on June 27, 2007, she served the foregoing documents by email and by U.S. Mail upon the following counsel:

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/s/ Ashley B. Stitzer, (as3891)
Ashley B. Stitzer

Exhibit 1

PATENT

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:06-cv-00726-JJF**

LG.Philips LCD Co. Ltd. v. Chi Mei Optoelectronics
Corporation et al

Assigned to: Honorable Joseph J. Farnan, Jr.

Related Cases: 1:05-cv-00292-JJF

1:07-cv-00357-JJF

Cause: 35:271 Patent Infringement

Date Filed: 12/01/2006

Jury Demand: Both

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Plaintiff

LG.Philips LCD Co. Ltd.

represented by **Ashley Blake Stitzer**

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V.

Defendant

Chi Mei Optoelectronics Corporation

represented by **Philip A. Rovner**

Potter Anderson & Corroon, LLP

		Attorney John N. Zarian, Samia McCall, Matthew D. Thayne, and J. Walter Sinclair filed by Viewsonic Corporation. Signed by Judge Joseph J. Farnan, Jr. on 4/10/2007. (lec) (Entered: 04/11/2007)
04/11/2007	<u>28</u>	STIPULATION TO EXTEND TIME Stipulation and Agreement Not to Contest Personal Jurisdiction or Sufficiency of Process or Sufficiency of Service of Process and to Extend Time to Respond to the Complaint to June 5, 2007 - filed by LG.Philips LCD Co. Ltd., Au Optronics Corporation, AU Optronics Corporation America. (Pascale, Karen) (Entered: 04/11/2007)
04/11/2007	<u>29</u>	First AMENDED COMPLAINT against Au Optronics Corporation, AU Optronics Corporation America- filed by LG.Philips LCD Co. Ltd.. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Exhibit B# <u>3</u> Exhibit C# <u>4</u> Exhibit D# <u>5</u> Exhibit E# <u>6</u> Exhibit F)(Kirk, Richard) (Entered: 04/11/2007)
04/13/2007		SO ORDERED D.I. <u>28</u> STIPULATION TO EXTEND TIME Stipulation and Agreement Not to Contest Personal Jurisdiction or Sufficiency of Process or Sufficiency of Service of Process and to Extend Time to Respond to the Complaint to June 5, 2007 filed by LG.Philips LCD Co. Ltd., AU Optronics Corporation America, Au Optronics Corporation. Signed by Judge Joseph J. Farnan, Jr. on 4/13/2007. (lec) (Entered: 04/13/2007)
04/13/2007		SO ORDERED D.I. <u>27</u> Stipulation filed by LG.Philips LCD Co. Ltd., Set Briefing Schedule: re <u>19</u> MOTION to Dismiss for Insufficiency of Process MOTION to Dismiss for Lack of Jurisdiction Over the Person. Answering Brief due 5/22/2007. Signed by Judge Joseph J. Farnan, Jr. on 4/13/2007. (lec) (Entered: 04/13/2007)
04/23/2007	<u>30</u>	STIPULATION To Agree Not To Contest Personal Jurisdiction Or Sufficiency Of Process Or Sufficiency Of Service Of Process And To Extend Time To Respond To The Complaint by LG.Philips LCD Co. Ltd.. (Kirk, Richard) (Entered: 04/23/2007)
04/25/2007	<u>31</u>	NOTICE of Appearance by Jennifer M. Becnel-Guzzo on behalf of Tatung Company of America Inc., Tatung Company (Becnel-Guzzo, Jennifer) (Entered: 04/25/2007)
04/25/2007	<u>32</u>	NOTICE of Appearance by William E. Manning on behalf of Tatung Company of America Inc., Tatung Company (Manning, William) (Entered: 04/25/2007)
04/25/2007	<u>33</u>	MOTION for Pro Hac Vice Appearance of Attorney Jeffrey M. Ratnoff - filed by Tatung Company of America Inc., Tatung Company. (Attachments: # <u>1</u> Certification of Counsel# <u>2</u> Proposed Order)(Becnel-Guzzo, Jennifer) (Entered: 04/25/2007)
04/25/2007	<u>34</u>	MOTION for Pro Hac Vice Appearance of Attorney Karineh Khachatourian - filed by Tatung Company of America Inc., Tatung Company. (Attachments: # <u>1</u> Certification of Counsel# <u>2</u> Proposed Order) (Becnel-Guzzo, Jennifer) (Entered: 04/25/2007)
04/26/2007		SO ORDERED D.I. <u>30</u> Stipulation filed by LG.Philips LCD Co. Ltd.,

		Set/Reset Answer Deadlines: Tatung Company of America Inc. answer due 6/5/2007; Tatung Company answer due 6/5/2007. Signed by Judge Joseph J. Farnan, Jr. on 4/26/2007. (lec) (Entered: 04/27/2007)
04/30/2007	<u>35</u>	NOTICE of Notice of Withdrawal by Viewsonic Corporation re <u>24</u> Opening Brief in Support,, <u>23</u> MOTION to Stay / <i>Defendant ViewSonic Corporation's Motion to Stay and Motion to Dismiss, or in the Alternative, for a More Definite Statement</i> (Attachments: # <u>1</u> Certificate of Service) (Johnson, Edmond) (Entered: 04/30/2007)
05/01/2007	<u>36</u>	MOTION for Pro Hac Vice Appearance of Attorney Bryan J. Sinclair - filed by Tatung Company of America Inc., Tatung Company. (Attachments: # <u>1</u> Certification of Counsel# <u>2</u> Proposed Order)(Becnel-Guzzo, Jennifer) (Entered: 05/01/2007)
05/01/2007	<u>37</u>	MOTION to Stay re <u>25</u> Declaration,, / <i>Defendant ViewSonic Corporation's Motion to Stay</i> - filed by Viewsonic Corporation. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>38</u>	MEMORANDUM in Support re <u>37</u> MOTION to Stay re <u>25</u> Declaration,, / <i>Defendant ViewSonic Corporation's Motion to Stay</i> filed by Viewsonic Corporation. Answering Brief/Response due date per Local Rules is 5/18/2007. (Attachments: # <u>1</u> Certificate of Service)(Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>39</u>	MOTION for More Definite Statement / <i>Defendant ViewSonic's Motion For A More Definite Statement</i> - filed by Viewsonic Corporation. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>40</u>	MEMORANDUM in Support re <u>39</u> MOTION for More Definite Statement / <i>Defendant ViewSonic's Motion For A More Definite Statement</i> filed by Viewsonic Corporation. Answering Brief/Response due date per Local Rules is 5/18/2007. (Attachments: # <u>1</u> certificate of service) (Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>41</u>	MOTION to Dismiss for Failure to State a Claim - filed by Viewsonic Corporation. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>42</u>	MEMORANDUM in Support re <u>41</u> MOTION to Dismiss for Failure to State a Claim filed by Viewsonic Corporation. Answering Brief/Response due date per Local Rules is 5/18/2007. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/01/2007)
05/01/2007	<u>43</u>	NOTICE of MOTION by Viewsonic Corporation re <u>37</u> MOTION to Stay re <u>25</u> Declaration,, / <i>Defendant ViewSonic Corporation's Motion to Stay</i> , <u>39</u> MOTION for More Definite Statement / <i>Defendant ViewSonic's Motion For A More Definite Statement</i> (Attachments: # <u>1</u> certificate of service) (Johnson, Edmond) . (Entered: 05/01/2007)
05/01/2007		SO ORDERED D.I. 34 MOTION for Pro Hac Vice Appearance of Attorney Karineh Khachatourian filed by Tatung Company of America Inc., Tatung Company. Signed by Judge Joseph J. Farnan, Jr. on 5/1/2007.

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In Re:)
)
Procedure for filing non-case dispositive)
motions in patent cases)

ORDER

Please note a change of the procedure for filing non-case dispositive motions in patent cases. This procedure is effective immediately and shall be used in lieu of the discovery dispute procedure in all existing Scheduling Orders.

- I. Any non-case dispositive motion, along with an Opening Brief, shall be filed with a Notice of Motion.
- II. The Notice of Motion shall indicate the date the movant seeks to have the motion heard. The date selected shall be within 30 days of the filing of the motion and allow for briefing in accordance with the Federal and Local Rules. The Court has scheduled the following Motion Days:

February 2, 2007 at 10:00 a.m.
March 2, 2007 at 10:00 a.m.
April 13, 2007 at 10:00 a.m.
May 4, 2007 at 10:00 a.m.
June 1, 2007 at 10:00 a.m.
July 13, 2007 at 10:00 a.m.
- III. Upon filing of the Notice of Motion a copy of said Notice should be sent to chambers at: jjf_civil@ded.uscourts.gov.
- IV. At the motion hearing, each side is allocated twenty (20) minutes to argue and respond to questions from the Court.

December 15, 2006
DATE

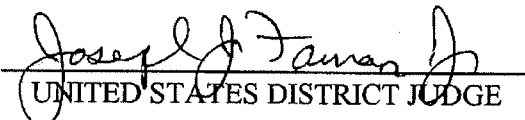

UNITED STATES DISTRICT JUDGE

Exhibit 3

PATENT

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:06-cv-00726-JJF**

LG.Philips LCD Co. Ltd. v. Chi Mei Optoelectronics
Corporation et al

Assigned to: Honorable Joseph J. Farnan, Jr.

Related Cases: [1:05-cv-00292-JJF](#)

[1:07-cv-00357-JJF](#)

Cause: 35:271 Patent Infringement

Date Filed: 12/01/2006

Jury Demand: Both

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Plaintiff

LG.Philips LCD Co. Ltd.

represented by **Ashley Blake Stitzer**
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V.

Defendant

Chi Mei Optoelectronics Corporation

represented by **Philip A. Rovner**
Potter Anderson & Corroon, LLP

LG.Philips LCD Co. Ltd.

Date Filed	#	Docket Text
12/01/2006	<u>1</u>	COMPLAINT filed with Jury Demand against Tatung Company of America Inc., Viewsonic Corporation, Chi Mei Optoelectronics Corporation, Au Optronics Corporation, AU Optronics Corporation America, Tatung Company - Magistrate Consent Notice to Pltf. (Filing fee \$ 350, receipt number 145535.) - filed by LG.Philips LCD Co. Ltd.. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Exhibit B# <u>3</u> Exhibit C# <u>4</u> Civil Cover Sheet # <u>5</u> Acknowledgement of Consent Form)(els) (Entered: 12/04/2006)
12/01/2006	<u>2</u>	Notice of Availability of a U.S. Magistrate Judge to Exercise Jurisdiction (els) (Entered: 12/04/2006)
12/01/2006		No Summons Issued (els) (Entered: 12/04/2006)
12/04/2006	<u>3</u>	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 5,019,002; 5,825,449; 4,624,737; (els) (Entered: 12/04/2006)
12/13/2006		Case assigned to Judge Joseph J. Farnan, Jr. Please include the initials of the Judge (JJF) after the case number on all documents filed. (rjb) (Entered: 12/13/2006)
12/15/2006		Remark: Please note a change of the procedure for filing non-case dispositive motions in patent cases. This procedure is effective immediately and shall be used in lieu of the discovery dispute procedure in all existing Scheduling Orders. Please see Standing Order for details at: http://www.ded.uscourts.gov/JJF/CaseMgmt/ordrenondispmotions.pdf (dlk) (Entered: 12/15/2006)
02/13/2007		Summons Issued as to Tatung Company of America Inc. on 2/13/2007; Viewsonic Corporation on 2/13/2007; Chi Mei Optoelectronics Corporation on 2/13/2007; Au Optronics Corporation on 2/13/2007; AU Optronics Corporation America on 2/13/2007; Tatung Company on 2/13/2007. (eew) (Entered: 02/13/2007)
02/16/2007	<u>4</u>	Return of Service Executed by LG.Philips LCD Co. Ltd.. AU Optronics Corporation America served on 2/15/2007, answer due 3/7/2007. (Kirk, Richard) (Entered: 02/16/2007)
02/16/2007	<u>5</u>	Return of Service Executed by LG.Philips LCD Co. Ltd.. Tatung Company served on 2/15/2007, answer due 3/7/2007. (Kirk, Richard) (Entered: 02/16/2007)
02/16/2007	<u>6</u>	Return of Service Executed by LG.Philips LCD Co. Ltd.. AU Optronics Corporation served on 2/15/2007, answer due 3/7/2007. (Kirk, Richard) (Entered: 02/16/2007)
02/16/2007	<u>7</u>	Return of Service Executed by LG.Philips LCD Co. Ltd.. Tatung Company of America Inc. served on 2/15/2007, answer due 3/7/2007. (Kirk, Richard) (Entered: 02/16/2007)

Exhibit 4

PATENT

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:06-cv-00726-JJF**

LG.Philips LCD Co. Ltd. v. Chi Mei Optoelectronics
Corporation et al

Assigned to: Honorable Joseph J. Farnan, Jr.

Related Cases: [1:05-cv-00292-JJF](#)

[1:07-cv-00357-JJF](#)

Cause: 35:271 Patent Infringement

Date Filed: 12/01/2006

Jury Demand: Both

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Plaintiff

LG.Philips LCD Co. Ltd.

represented by **Ashley Blake Stitzer**

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V.

Defendant

Chi Mei Optoelectronics Corporation

represented by **Philip A. Rovner**

Potter Anderson & Corroon, LLP

05/29/2007	<u>68</u>	REPLY BRIEF re <u>37</u> MOTION to Stay re <u>25</u> Declaration,, / <i>Defendant ViewSonic Corporation's Motion to Stay</i> filed by Viewsonic Corporation. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/29/2007)
05/29/2007	<u>69</u>	REPLY BRIEF re <u>39</u> MOTION for More Definite Statement / <i>Defendant ViewSonic's Motion For A More Definite Statement</i> filed by Viewsonic Corporation. (Attachments: # <u>1</u> certificate of service)(Johnson, Edmond) (Entered: 05/29/2007)
05/31/2007		SO ORDERED D.I. <u>65</u> Joint STIPULATION TO EXTEND TIME time for Chi Mei Optoelectronics Corporation to file reply brief re Motion to Dismiss for Lack of Personal Jurisdiction (D.I. 19) to June 15, 2007 filed by Chi Mei Optoelectronics Corporation, Set Briefing Schedule: re <u>19</u> MOTION to Dismiss for Insufficiency of Process MOTION to Dismiss for Lack of Jurisdiction Over the Person. Reply Brief due 6/15/2007. Signed by Judge Joseph J. Farnan, Jr. on 5/31/2007. (lec) (Entered: 05/31/2007)
06/05/2007	<u>70</u>	MOTION for More Definite Statement - filed by Tatung Company of America Inc., Tatung Company. (Attachments: # <u>1</u> Notice of Motion-Motion to be presented to the Court on July 13, 2007 at 10:00 a.m.# <u>2</u> Proposed Order)(Manning, William) (Entered: 06/05/2007)
06/05/2007	<u>71</u>	OPENING BRIEF in Support re <u>70</u> MOTION for More Definite Statement filed by Tatung Company of America Inc., Tatung Company. Answering Brief/Response due date per Local Rules is 6/22/2007. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Unreported cases cited)(Manning, William) (Entered: 06/05/2007)
06/05/2007	<u>72</u>	ANSWER to Amended Complaint with Jury Demand, COUNTERCLAIM against LG. Philips LCD America, Inc., LG.Philips LCD Co. Ltd. by Au Optronics Corporation, AU Optronics Corporation America. (Attachments: # <u>1</u> Exhibit A-C)(Pascale, Karen) (Entered: 06/05/2007)
06/07/2007		Summons Issued as to LG. Philips LCD America, Inc. on 6/7/2007. (rwc) (Entered: 06/07/2007)
06/11/2007		Remark: Motion for More Definite Statement (D.I. 70) filed by Tatung, et al. is STRICKEN. The Motion was not filed in compliance with the Court's December 15, 2006 Standing Order regarding Procedure for Filing Non-Dispositive Motions in Patent Cases. (dlk) (Entered: 06/11/2007)
06/12/2007	<u>73</u>	Letter to Ms. Deborah Krett- Case Manager from William E. Manning, Esq. regarding Request for reconsideration of decision to strike the Tatung Defendants' Motion for a More Definite Statement - re <u>70</u> MOTION for More Definite Statement, Remark,. (Attachments: # <u>1</u> Attachment- Time-Stamped Notice of Motion)(Manning, William) (Entered: 06/12/2007)
06/13/2007	<u>74</u>	MOTION for More Definite Statement (<i>Renewed</i>) - filed by Tatung Company of America Inc., Tatung Company. (Attachments: # <u>1</u> Notice of Motion Notice of Renewed Motion# <u>2</u> Proposed Order for Renewed Motion)(Manning, William) (Entered: 06/13/2007)
06/13/2007	<u>75</u>	OPENING BRIEF in Support of <i>Renewed Motion for a More Definite</i>

Exhibit 5

Bono, Gaspare

From: Dick Kirk [rkirk@bayardfirm.com]
Sent: Tuesday, May 22, 2007 3:50 PM
To: Arthur P. Licygiewicz; David E. Moore; Edmond D. Johnson; Hua Chen; J. Walter Sinclair; Jay C. Chiu; Jennifer M. Becnel-Guzzo; John N. Zarian; John W. Shaw; Jonathan Hangartner; Karen L. Pascale; Kenneth R. Adamo; Matthew D. Thayne; Peter J. Wied; Philip A. Rovner; Robert C. Kahrl; Samia E. McCall; Thomas H. Kovach; Vincent K. Yip; William E. Manning
Cc: Bono, Gaspare
Subject: LG.Philips v. Chi Mei Optoelectronics Corporation, C.A. No. 06-726-JJF
Attachments: first amended complaint_CMO.pdf; Ex A_USP 5019002.pdf; Ex B_USP 5825449.pdf; Ex C_USP 4624737.pdf; Ex D_USP 6008786.pdf; Ex E_USP 6013923.pdf; Ex F_USP 5619352.pdf; Ex G_USP 6734926.pdf; COS_052207.pdf; PRAECIPE - CHI MEI OPTOELECTRONICS USA.pdf; PRAECIPE - CHI MEI OPTOELECTRONICS CORPORATION.pdf

Dear counsel:

Attached is LPL's First Amended Complaint for Patent Infringement Against Defendant Chi Mei Optoelectronics Corporation and Chi Mei Optoelectronics USA, Inc. which was filed today (D.I. 54). This pleading was not directed at or intended to affect any other defendant. I am also attaching the praecipes we filed (D. I. 55 and D.I. 56) for summonses directed to those two defendants. Hard copies will be sent to you.

Phil, I have assumed that you are not authorized to accept service of this pleading on behalf of the Chi Mei entities. This email and the hard copies, then, are courtesy copies for you. We will serve Chi Mei Optoelectronics Corporation through the Secretary of State and Chi Mei Optoelectronics USA, Inc. through its registered agent.

Regards,

Dick Kirk

Richard D. Kirk
The Bayard Firm
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6/27/2007

Exhibit 6

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14 Attorneys for Plaintiff
15 LG.PHILIPS LCD CO., LTD.

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18 LG.PHILIPS LCD CO., LTD.,
19 Plaintiff,
20 vs.

21 TATUNG CO. OF AMERICA,
22 TATUNG COMPANY AND CHUNGHWA
23 PICTURE TUBES, LTD.,
24 Defendants.

Case No.

02-6775 CBM JTLx
COMPLAINT FOR PATENT
INFRINGEMENT

[DEMAND FOR JURY TRIAL]

25 Plaintiff LG.Philips LCD Co., Ltd. ("LPL"), by its
26 undersigned attorneys, complains of Defendants and alleges as
27 follows:

28 JURISDICTION AND VENUE

1. This is an action for patent infringement, arising
under the patent laws of the United States, Title 35 of the
United States Code, § 1, et seq. This court has jurisdiction

1 over the subject matter of this action pursuant to Title 28 of
2 the United States Code, §§ 1331 and 1338(a).

3 2. Venue is proper in this judicial district under Title
4 28 of the United States Code, §§ 1391(b), 1391(c), 1391(d) and
5 1400(b).

6 PARTIES

7 3. Plaintiff LPL is a corporation organized under the laws
8 of the Republic of Korea having a place of business located in
9 Seoul, Korea.

10 4. LPL is informed and believes, and on that basis
11 alleges, that Defendant Tatung Co. of America ("Tatung America")
12 is a corporation existing under the laws of the State of
13 California having a place of business located at 2850 El Presidio
14 Street, Long Beach, California.

15 5. LPL is informed and believes, and on that basis
16 alleges, that Defendant Tatung Company ("Tatung") is a
17 corporation existing under the laws of Taiwan and is the parent
18 company of Tatung America.

19 6. LPL is informed and believes, and on that basis
20 alleges, that Defendant Chunghwa Picture Tubes, Ltd. ("CPT") is a
21 corporation existing under the laws of Taiwan and is a subsidiary
22 of Defendant Tatung. LPL is informed and believes, and on that
23 basis alleges, that CPT maintains a sales office at 550 Nutman
24 Street, Santa Clara, California.

25 LPL'S PATENTS-IN-SUIT

26 7. LPL is the owner by assignment of all rights, title and
27 interest in and to United States Patent No. 4,624,737 ("the '737
28 patent"), issued on November 25, 1986, entitled "Process for

1 Producing Thin-Film Transistor." A true and correct copy of the
2 '737 patent is attached hereto as Exhibit "A."

3 8. LPL is the owner by assignment of all rights, title and
4 interest in and to United States Patent No. 5,825,449 ("the '449
5 patent"), issued on October 20, 1998, entitled "Liquid Crystal
6 Display Device and Method of Manufacturing the Same." A true and
7 correct copy of the '449 patent is attached hereto as Exhibit
8 "B."

9 9. LPL is the owner by assignment of all rights, title and
10 interest in and to United States Patent No. 6,373,537 ("the '537
11 patent"), issued on April 16, 2002, entitled "Computer Having
12 Liquid Crystal Display Between Frames Attached at the Edges."
13 A true and complete copy of the '537 patent is attached as
14 Exhibit "C."

15 10. LPL is the owner by assignment of all rights, title and
16 interest in and to United States Patent No. 6,020,942 ("the '942
17 patent"), issued on February 1, 2000, entitled "Computer Having
18 Liquid Crystal Display." A true and complete copy of the '942
19 patent is attached as Exhibit "D."

20 11. LPL is the owner by assignment of all rights, title and
21 interest in and to United States Patent No. 6,002,457 ("the '457
22 patent"), issued on December 14, 1999, entitled "Computer Having
23 Liquid Crystal Display." A true and complete copy of the '457
24 patent is attached as Exhibit "E."

25 12. LPL is the owner by assignment of all rights, title and
26 interest in and to United States Patent No. 5,926,237 ("the '237
27 patent"), issued on July 20, 1999, entitled "Computer Having
28

1 Liquid Crystal Display." A true and complete copy of the '237
2 patent is attached as Exhibit "F."

3 DEFENDANTS' INFRINGEMENT OF LPL'S PATENTS

4 13. LPL is informed and believes, and on that basis
5 alleges, that Defendant CPT manufactures liquid crystal display
6 ("LCD") panels that infringe LPL's patents as set forth in the
7 claims that follow, and that at least Tatung incorporates those
8 LCD panels into computer products, such as monitors. LPL is
9 informed and believes, and on that basis alleges, that at least
10 Tatung America, Tatung's sales and distribution subsidiary,
11 imports into and sells in the United States, including within
12 this judicial district, computer products that include such CPT
13 LCD panels.

14 14. LPL is informed and believes, and on that basis
15 alleges, that CPT maintains a sales representative in California,
16 has demonstrated and offered for sale LCD products in this
17 judicial district, and sells to California customers LCD panels
18 (and/or products with LCD panels incorporated therein) that
19 infringe LPL's patents as set forth in the claims that follow.

20 15. LPL is informed and believes, and on that basis
21 alleges, that Tatung, Tatung America, and CPT are working in
22 concert to import and sell in the United States infringing LCD
23 panels (and/or products with infringing LCD panels incorporated
24 therein).

25 FIRST CLAIM FOR RELIEF

26 (INFRINGEMENT OF THE '737 PATENT)

27 16. LPL incorporates by this reference paragraphs 1 through
28 15 above, as though fully set forth herein.

1 17. Defendants have infringed and are infringing the '737
2 patent by making, using, selling, offering for sale and/or
3 importing into the United States products manufactured by a
4 process covered by one or more claims of the '737 patent, by
5 actively inducing and encouraging others to do so and/or by
6 contributing to such infringement.

7 18. Defendants have infringed and are infringing the '737
8 patent with knowledge of LPL's patent rights and without a
9 reasonable basis for believing that Defendants' conduct is
10 lawful. Defendants' acts of infringement have been willful,
11 deliberate, and in reckless disregard of LPL's patent rights, and
12 will continue unless enjoined by this Court.

13 19. By reason of the foregoing, LPL has been damaged and
14 will continue to sustain damages in an amount to be determined at
15 trial and has suffered and will continue to suffer irreparable
16 loss and injury.

17 SECOND CLAIM FOR RELIEF

18 (INFRINGEMENT OF THE '449 PATENT)

19 20. LPL incorporates by this reference paragraphs 1 through
20 15 above, as though fully set forth herein.

21 21. Defendants have infringed and are infringing the '449
22 patent by making, using, selling, offering for sale and/or
23 importing into the United States products covered by one or more
24 claims of the '449 patent, by making, using, selling, offering
25 for sale and/or importing into the U.S. products manufactured by
26 a process covered by one or more claims of the '449 patent, by
27 actively inducing and encouraging others to do so and/or by
28 contributing to such infringement.

1 22. Defendants have infringed and are infringing the '449
2 patent with knowledge of LPL's patent rights and without a
3 reasonable basis for believing that Defendants' conduct is
4 lawful. Defendants' acts of infringement have been willful,
5 deliberate, and in reckless disregard of LPL's patent rights, and
6 will continue unless enjoined by this Court.

7 23. By reason of the foregoing, LPL has been damaged and
8 will continue to sustain damages in an amount to be determined at
9 trial and has suffered and will continue to suffer irreparable
10 loss and injury.

11 THIRD CLAIM FOR RELIEF

12 (INFRINGEMENT OF THE '537 PATENT)

13 24. LPL incorporates by this reference paragraphs 1 through
14 15 above, as though fully set forth herein.

15 25. CPT has infringed and is infringing the '537 patent by
16 making, using, selling, offering for sale and/or importing into
17 the United States products covered by one or more claims of the
18 '537 patent, by actively inducing and encouraging others to do so
19 and/or by contributing to such infringement.

20 26. CPT has infringed and is infringing the '537 patent
21 with knowledge of LPL's patent rights and without a reasonable
22 basis for believing that its conduct is lawful. CPT's acts of
23 infringement have been willful, deliberate, and in reckless
24 disregard of LPL's patent rights, and will continue unless
25 enjoined by this Court.

26 27. By reason of the foregoing, LPL has been damaged and
27 will continue to sustain damages in an amount to be determined at
28

1 trial and has suffered and will continue to suffer irreparable
2 loss and injury.

3 FOURTH CLAIM FOR RELIEF

4 (INFRINGEMENT OF THE '942 PATENT)

5 28. LPL incorporates by this reference paragraphs 1 through
6 15 above, as though fully set forth herein.

7 29. CPT has infringed and is infringing the '942 patent by
8 making, using, selling, offering for sale and/or importing into
9 the United States products covered by one or more claims of the
10 '942 patent, by actively inducing and encouraging others to do so
11 and/or by contributing to such infringement.

12 30. By reason of the foregoing, LPL has been damaged and
13 will continue to sustain damages in an amount to be determined at
14 trial and has suffered and will continue to suffer irreparable
15 loss and injury.

16 FIFTH CLAIM FOR RELIEF

17 (INFRINGEMENT OF THE '457 PATENT)

18 31. LPL incorporates by this reference paragraphs 1 through
19 15 above, as though fully set forth herein.

20 32. CPT has infringed and is infringing the '457 patent by
21 making, using, selling, offering for sale and/or importing into
22 the United States products covered by one or more claims of the
23 '457 patent, by actively inducing and encouraging others to do so
24 and/or by contributing to such infringement.

25 33. CPT has infringed and is infringing the '457 patent
26 with knowledge of LPL's patent rights and without a reasonable
27 basis for believing that its conduct is lawful. CPT's acts of
28 infringement have been willful, deliberate, and in reckless

1 disregard of LPL's patent rights, and will continue unless
2 enjoined by this Court.

3 34. By reason of the foregoing, LPL has been damaged and
4 will continue to sustain damages in an amount to be determined at
5 trial and has suffered and will continue to suffer irreparable
6 loss and injury.

7 SIXTH CLAIM FOR RELIEF

8 (INFRINGEMENT OF THE '237 PATENT)

9 35. LPL incorporates by this reference paragraphs 1 through
10 15 above, as though fully set forth herein.

11 36. CPT has infringed and is infringing the '237 patent by
12 making, using, selling, offering for sale and/or importing into
13 the U.S. products manufactured by a process covered by one or
14 more claims of the '237 patent, by actively inducing and
15 encouraging others to do so and/or by contributing to such
16 infringement.

17 37. CPT has infringed and is infringing the '237 patent
18 with knowledge of LPL's patent rights and without a reasonable
19 basis for believing that its conduct is lawful. CPT's acts of
20 infringement have been willful, deliberate, and in reckless
21 disregard of LPL's patent rights, and will continue unless
22 enjoined by this Court.

23 38. By reason of the foregoing, LPL has been damaged and
24 will continue to sustain damages in an amount to be determined at
25 trial and has suffered and will continue to suffer irreparable
26 loss and injury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff LPL prays for relief against Defendants Tatung America, Tatung and CPT as follows:

1. For a judgment that Defendants have infringed LPL's United States Patent Nos. 4,624,737 and 5,825,449;

2. For a judgment that CPT has also infringed LPL's U.S. Patent Nos. 6,373,537, 6,020,942, 6,002,457, and 5,926,237;

3. For preliminary and permanent injunctive relief against Defendants' further infringement of LPL's United States patents;

4. For an award of damages for Defendants' infringement of LPL's patents, together with interest, costs and disbursements as fixed by this Court under Title 35 of the United States Code § 284;

5. For a determination that Defendants' infringement is willful, and an award of trebled damages under Title 35 of the United States Code § 284, for infringement of LPL's patents;

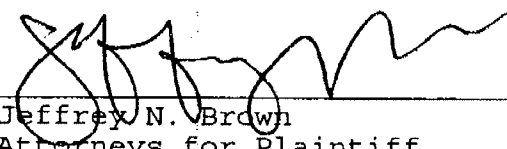
6. For a determination that this is an exceptional case within the meaning of Title 35 of the United States Code § 285 and an assessment of LPL's reasonable attorneys' fees; and

7. For such other and further relief as the Court deems just and proper.

Dated: August 29, 2002

MORGAN, LEWIS & BOCKIUS LLP

By


Jeffrey N. Brown
Attorneys for Plaintiff
LG. PHILIPS LCD CO., LTD.

JURY TRIAL DEMAND

Plaintiff LG.Philips LCD Co., Ltd. hereby demands a trial by jury on all issues properly triable by jury.

Dated: August 29, 2002

MORGAN, LEWIS & BOCKIUS LLP

By

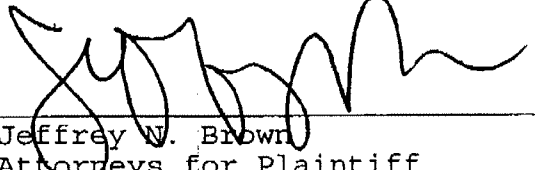

Jeffrey W. Brown
Attorneys for Plaintiff
LG.PHILIPS LCD CO., LTD.

Exhibit 7

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants.

Civil Action No. _____

DEMAND FOR TRIAL BY JURY

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff LG.Philips LCD Co., Ltd. ("LPL") for its Complaint against Defendants Tatung Company; Tatung Company of America, Inc.; Chunghwa Picture Tubes, Ltd.; and ViewSonic Corporation (collectively the "Defendants") for preliminary and permanent injunctive and declaratory relief and for damages, including treble or multiple damages, for patent infringement, states and alleges as follows:

NATURE OF THE ACTION

1. LPL is the owner of United States Patent No. 6,738,121 ("the '121 Patent") and United States Patent No. 5,019,002 ("the '002 Patent") (collectively the "Patents-in-Suit"). This is a civil action for the infringement of the Patents-in-Suit, including the willful infringement of the Patents-in-Suit by Defendants.

2. The technology at issue involves the design and manufacture of Liquid Crystal Display modules ("LCDs"), which are a type of flat panel display that are incorporated into at least LCD portable computers, LCD computer monitors and LCD televisions.

THE PARTIES

3. Plaintiff LPL is a corporation organized under the laws of the Republic of Korea, having a place of business located in Seoul, Korea.

4. Defendant Tatung Company ("Tatung") is a Taiwanese corporation, having a place of business at 22 Chungshan N Rd. Section 3, Taipei, Taiwan.

5. Defendant Tatung Company of America, Inc. ("Tatung America") is a subsidiary of Tatung. Tatung America is a California corporation, having a place of business at 2850 El Presidio Street, Long Beach, California 90810. Tatung America markets and sells Tatung's products throughout the United States.

6. Defendant Chunghwa Picture Tubes, Ltd. ("CPT") is a subsidiary and/or affiliate of Tatung. CPT is a Taiwanese corporation, having a place of business at No. 1127, Ho-ping Road, Tanan, Pahte, Taoyuan, Taiwan.

7. Defendant ViewSonic Corporation ("ViewSonic") is a Delaware Corporation, having a place of business at 381 Brea Canyon Road, Walnut, California 91789.

JURISDICTION AND VENUE

8. This action is based upon and arises under the Patent Laws of the United States, 35 U.S.C. § 100 *et seq.*, and in particular §§ 271, 281, 283, 284 and 285, and is intended to redress infringement of the Patents-in-Suit owned by LPL.

9. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10. Defendants have transacted and continue to transact business in the United States and in this judicial district by: using or causing to be used; making; importing or causing to be imported; offering to sell or causing to be offered for sale; and/or selling or causing to be sold directly, through intermediaries and/or as an intermediary, a variety of products that infringe the Patents-in-Suit to customers in the United States, including customers in this judicial district, and Defendants will continue to do so unless enjoined by this Court.

11. This Court has personal jurisdiction over Tatung and CPT, and venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 (b) and (c) and (d), and 28 U.S.C. § 1400(b), in that these Defendants are committing and are causing acts of patent infringement within the United States and within this judicial district, including the infringing acts alleged herein, both directly, through one or more intermediaries, and as an intermediary, and in that these Defendants have caused and cause injury and damages in this judicial district by acts or omissions outside of this judicial district, including but not limited to utilization of their own distribution channels established in the United States and Tatung America's distribution channels in the United States, as set forth below, to ship a variety of products that infringe the Patents-in-Suit into the United States and into this judicial district while deriving substantial revenue from services or things used or consumed within this judicial district, and will continue to do so unless enjoined by this Court.

12. This Court has personal jurisdiction over Tatung America and venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 (b) and (c), and 28 U.S.C. § 1400(b), in that Tatung America is committing acts of patent infringement within the United States and within

this judicial district, including the infringing acts alleged herein, both directly, through one or more intermediaries, and as an intermediary. Tatung America regularly imports large quantities of Tatung LCD products into the United States for distribution throughout the United States, including in this judicial district. Tatung America is intimately involved in the distribution of infringing LCD products and is acutely aware that its products are sold throughout the United States, including in Delaware. Tatung's and Tatung America's established distribution networks consist of numerous national distributors and resellers, and Tatung and Tatung America distribute to national retailers that have stores located in Delaware. By shipping into, offering to sell in, using, or selling products that infringe the Patents-in-Suit in this judicial district, or by inducing or causing those acts to occur, Tatung America has transacted and transacts business and performs works and services in this judicial district, has contracted and contracts to supply services and things in this judicial district, has caused and causes injury and damages in this judicial district by acts and omissions in this judicial district, and has caused and causes injury and damages in this judicial district by acts or omissions outside of this judicial district while deriving substantial revenue from services or things used or consumed within this judicial district, and will continue to do so unless enjoined by this Court.

13. This Court has personal jurisdiction over ViewSonic, and venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 (b) and (c), and 28 U.S.C. § 1400(b), in that ViewSonic is incorporated and therefore resides in Delaware for purposes of establishing venue in this district, in that ViewSonic has been doing business in Delaware, including the infringing acts alleged herein, both directly, through one or more intermediaries, and/or as an intermediary, and will continue to do so unless enjoined by this Court.

THE PATENTS-IN-SUIT

14. On May 18, 2004, the '121 Patent, entitled "Tape Carrier Package with Dummy Bending Part and Liquid Crystal Display Employing the Same," was duly and legally issued, listing LPL as assignee. A copy of the '121 Patent is attached as Exhibit A.

15. On May 28, 1991, the '002 Patent, entitled "Method of Manufacturing Flat Panel Backplanes including Electrostatic Discharge Prevention and Displays Made Thereby," was duly and legally issued, listing LPL as assignee. A copy of the '002 Patent is attached as Exhibit B.

16. LPL owns the Patents-in-Suit and possesses the right to sue and to recover for infringement of the Patents-in-Suit.

17. Defendants have been and are infringing, contributorily infringing and/or actively inducing infringement of the Patents-in-Suit because they at least use, cause to be used, make, import, cause to be imported, offer for sale, cause to be offered for sale, sell, and/or cause to be sold in this judicial district and elsewhere in the United States products that infringe the Patents-in-Suit.

FACTUAL BACKGROUND

18. LPL has invested substantial time and money in designing, developing, manufacturing and producing LCD products that incorporate the patented LCD technology.

19. LPL derives substantial benefits from the exploitation of its patented technology in the United States and abroad. LPL's interests, including, but not limited to, these benefits have been and continue to be harmed by the Defendants' infringement of the Patents-in-Suit.

20. The Defendants at least use, cause to be used, make, import, cause to be imported, offer for sale, cause to be offered for sale, sell, and/or cause to be sold in the United States and in

this judicial district LCDs and/or LCD products and other electronic devices that are encompassed by and/or made by the methods claimed in the Patents-in-Suit.

21. The Defendants have actively induced and continue to actively induce the infringement of the Patents-in-Suit in the United States and in this judicial district. Defendants have engaged in active inducement by, *inter alia*, publishing and releasing engineering specifications in English for their infringing monitors and/or televisions; providing technical assistance to their resellers and customers in the United States; and marketing and distributing their infringing monitors and/or televisions through established distribution channels with knowledge of their intended sale and use in the United States, including in this judicial district.

COUNT I
(PATENT INFRINGEMENT BY DEFENDANTS TATUNG,
TATUNG AMERICA, CPT, AND VIEWSONIC OF THE '121 PATENT)

22. The allegations in the foregoing paragraphs of this Complaint are incorporated by reference herein as if restated and set forth in full.

23. Defendants have infringed, actively induced and/or contributed to the infringement of the '121 Patent by making, using, causing to be used, offering to sell, causing to be offered for sale, selling, causing to be sold, importing, and/or causing to be imported products that infringe one or more claims of the '121 Patent in this judicial district and elsewhere in the United States. Such infringing products include at least the product identified as a Tatung monitor L17AMTN offered for sale and sold by at least Best Buy to a customer in Delaware; and include at least the product identified as a ViewSonic monitor ES710 offered for sale and sold by at least CompUSA to a customer in Delaware; as well as products that infringe the '121 Patent that are not yet identified.

24. The infringing products that are made, used, caused to be used, sold, caused to be sold, offered for sale, caused to be offered for sale, imported, and/or caused to be imported by Defendants meet each and every limitation of at least one claim of the '121 Patent, either literally or equivalently.

25. LPL has been and will continue to be injured by Defendants' past and continuing infringement of the '121 Patent and is without adequate remedy at law.

26. Defendants have, upon information and belief, infringed and are infringing the '121 Patent with knowledge of LPL's patent rights and without a reasonable basis for believing their conduct is lawful. Defendants' infringement has been and continues to be willful and deliberate, and will continue unless enjoined by this Court, making this an exceptional case and entitling LPL to increased damages and reasonable attorneys' fees pursuant to 35 U.S.C. §§ 284 and 285.

COUNT II
(PATENT INFRINGEMENT BY DEFENDANTS TATUNG,
TATUNG AMERICA, CPT, AND VIEWSONIC OF THE '002 PATENT)

27. The allegations in the foregoing paragraphs of this Complaint are incorporated by reference herein as if restated and set forth in full.

28. Defendants have infringed, actively induced and/or contributed to the infringement of the '002 Patent by making, using, causing to be used, offering to sell, causing to be offered for sale, selling, causing to be sold, importing, and/or causing to be imported products that are made by a method that infringe one or more claims of the '002 Patent in this judicial district and elsewhere in the United States. Such infringing products include at least the product identified as a Tatung monitor L17AMTN offered for sale and sold by at least Best Buy to a

customer in Delaware; and include at least the product identified as a ViewSonic monitor ES710 offered for sale and sold by at least CompUSA to a customer in Delaware; as well as products that infringe the '121 Patent that are not yet identified.

29. The products made by the infringing method that are used, caused to be used, sold, caused to be sold, offered for sale, caused to be offered for sale, imported, and/or caused to be imported by Defendants meet each and every limitation of at least one claim of the '002 Patent, either literally or equivalently.

30. LPL has been and will continue to be injured by Defendants' past and continuing infringement of the '002 Patent and is without adequate remedy at law.

31. Defendants have, upon information and belief, infringed and are infringing the '002 Patent with knowledge of LPL's patent rights and without a reasonable basis for believing their conduct is lawful. Defendants' infringement has been and continues to be willful and deliberate, and will continue unless enjoined by this Court, making this an exceptional case and entitling LPL to increased damages and reasonable attorneys' fees pursuant to 35 U.S.C. §§ 284 and 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff LPL prays for judgment as follows:

A. That Tatung, Tatung America, CPT, and ViewSonic have infringed the Patents-in-Suit;

B. That Tatung's, Tatung America's, CPT's, and ViewSonic's infringement of the Patents-in-Suit has been willful.

C. That Tatung, Tatung America, CPT, and ViewSonic and their parents, subsidiaries, affiliates, successors, predecessors, assigns, and the officers, directors, agents, servants and employees of each of the foregoing, and those persons acting in concert or participation with any of them, are preliminarily and permanently enjoined and restrained from continued infringement, including but not limited to using, making, importing, offering for sale and/or selling products that infringe, and from contributory infringement and from inducing the infringement of, the Patents-in-Suit, prior to the expiration of the Patents-in-Suit, including any extensions;

D. That Tatung, Tatung America, CPT, and ViewSonic and their parents, subsidiaries, affiliates, successors, predecessors, assigns, and the officers, directors, agents, servants and employees of each of the foregoing, and those persons acting in concert or participation with any of them deliver to LPL all products that infringe, or induce or contribute to the infringement of the Patents-in-Suit for destruction at LPL's option;

E. That LPL be awarded monetary relief adequate to compensate LPL for Tatung's, Tatung America's, CPT's, and ViewSonic's acts of infringement of the Patents-in-Suit within the United States prior to the expiration of the Patents-in-Suit, including any extensions;

F. That any monetary relief awarded to LPL regarding the infringement of the Patents-in-Suit by Defendants be trebled due to the willful nature of Tatung's, Tatung America's, CPT's, and ViewSonic's infringement of the Patents-in-Suit;

G. That any monetary relief awarded to LPL be awarded with prejudgment interest;

H. That this is an exceptional case and that LPL be awarded the attorneys' fees, costs and expenses that it incurs prosecuting this action; and

I. That LPL be awarded such other and further relief as this Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury of any and all issues triable of right by a jury.

THE BAYARD FIRM

/s/ Richard D. Kirk
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Washington, D.C. 20006
(202) 496-7500

May 13, 2005

Exhibit 8

(JTLx), AO279, PROTORD, REOPENED, STAYED

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
(Western Division - Los Angeles)
CIVIL DOCKET FOR CASE #: 2:02-cv-06775-CBM-JTL**

LG Philips LCD Co v. Tatung Co Of America, et al
Assigned to: Judge Consuelo B. Marshall
Referred to: Discovery Jennifer T. Lum
Demand: \$0
Related Cases: [2:05-cv-00189-CBM-JTL](#)
[2:05-cv-07004-CBM-JTL](#)
Case in other court: Federal Circuit Court, 04-01330
Cause: 15:1126 Patent Infringement

Date Filed: 08/29/2002
Jury Demand: Both
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

LG Philips LCD Co Ltd

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Counter Defendant

LG Electronics Inc

Date Filed	#	Docket Text
08/29/2002	1	COMPLAINT filed Summons(es) Issued referred to Discovery Jennifer T. Lum; Jury Demand (pc) (Entered: 09/03/2002)
08/29/2002	2	NOTICE OF INTERESTED PARTIES filed by plaintiff LG Philips LCD Co (pc) (Entered: 09/03/2002)
08/29/2002		REPORT ON THE FILING OF AN ACTION REGARDING PATENT OR TRADEMARK (cc: form mailed to Washington, D.C.)(Opening) (el) (Entered: 09/03/2002)
09/05/2002		REPORT ON THE FILING OF AN ACTION REGARDING PATENT OR TRADEMARK (cc: form mailed to Washington, D.C.)(Opening) (el) (Entered: 09/06/2002)
09/11/2002	3	PROOF OF SERVICE executed upon defendant Tatung Co Of America; Service by Fed Statute on 9/3/02 via personal delivery by serving S/C to Michael Lai, Registered Agent, auth to receive service of process (el) (Entered: 09/11/2002)
09/12/2002	4	PROOF OF SERVICE executed upon defendant Tatung Co; Service by Fed on 9/3/02 via Personal delivery by serving S/C to Michael Lai, Registered Agent for its subsidiary, Tatung Company of America (el) (Entered: 09/16/2002)
09/19/2002	5	PROOF OF SERVICE executed upon defendant Chunghwa Picture ; Service by CCP on 9/3/02 via substituted by serving s/c to Janice Doe manager Tatugn Telecom manager (with person apparently in charge , Asian female, 5'5 125lbs, Black Hair on behalf of Dundee Hsieh General Manager; (1st class mail see decl of mailing fld on 9/19/02) (pj) (Entered: 09/19/2002)

		09/20/2002)
09/19/2002	6	DECL OF MAILING executed upon defendant Chunghwa Picture TUBES ltd ; Service by on 9/4/02 via BY MAIL by serving S/C to (pj) (Entered: 09/20/2002)
09/20/2002	7	APPLICATION AND ORDER of Non-Resident Attorney to Appear in a Specific Case filed for plaintiff LG Philips LCD Co by Nathan W McCutcheon. Designating Jeffrey N Brown as local counsel. Approved by Judge Consuelo B. Marshall . (Fee pd) (el) (Entered: 09/23/2002)
09/20/2002	8	APPLICATION AND ORDER of Non-Resident Attorney to Appear in a Specific Case filed for plaintiff LG Philips LCD Co by Anthony C Roth. Designating Jeffrey N Brown as local counsel. Approved by Judge Consuelo B. Marshall . (Fee pd) (el) (Entered: 09/23/2002)
09/20/2002	9	APPLICATION AND ORDER of Non-Resident Attorney to Appear in a Specific Case filed for plaintiff LG Philips LCD Co by John D Zele. Designating Jeffrey N Brown as local counsel. Approved by Judge Consuelo B. Marshall . (Fee pd) (el) (Entered: 09/23/2002)
09/20/2002	10	STIPULATION filed to extend time to answer complaint [1-1] to 10/23/02 as to defendant Tatung Co Of America, defendant Tatung Company (el) (Entered: 09/23/2002)
09/25/2002	11	PROOF OF SERVICE executed upon defendant Chunghwa Picture upon Chen-Yuan Lin, President; Service by (not indicated) on 9/3/02 via registered international mail by serving S/C to (stamped in chinese character), as agent, original return rcpt attached as Exhibit "A" (el) (Entered: 09/26/2002)
09/27/2002	12	PROOF OF SERVICE executed upon defendant Tatung Company ; Service by no statute indicated on 9/9/02 via by FOREIGN SERVICE by serving s/c to Lin Ting Shen of Tatung Company; The original return receipt for Intl Mail signed by an agent of Tatung Co is attached (pj) (Entered: 09/30/2002)
10/18/2002	14	REQUEST filed by plaintiff LG Philips LCD Co for entry of default as to Chunghwa Picture Tubes, Ltd ; Decl of Jeffrey N Brown (el) (Entered: 10/28/2002)
10/18/2002	15	SUPPLEMENTAL PROOF OF SERVICE by plaintiff LG Philips LCD Co re executed service [5-1] re plf's request to enter default agnst Chunghwa Picture Tubes Inc (el) (Entered: 10/28/2002)
10/20/2002	87	DECLARATION of Nathan W McCutcheon by plaintiff LG Philips LCD Co in support of motion for partial summary judgment of infringement of U.S> Pat. No 6,002,457 [84-1] (shb) (Entered: 10/23/2003)
10/22/2002	13	STIPULATION and ORDER by Judge Consuelo B. Marshall that dft Tatung Company may have an additional thirty (30) days through and including 11/22/02 in which to answer the complaint (el) (Entered: 10/23/2002)
10/25/2002	17	NOTICE OF MOTION AND MOTION by defendant Chunghwa Picture

		Tubes Ltd to extend time to file an answer or to otherwise respond to the complaint , and to strike request for entry of default ; motion hearing set for 10:00 12/2/02 (el) (Entered: 10/28/2002)
10/25/2002	18	DECLARATION of Teresa M Corbin in suppt by defendant Chunghwa Picture re motion to extend time to file an or to otherwise respond to the complaint [17-1], motion to strike request for entry of default [17-2] (el) (Entered: 10/28/2002)
10/25/2002	19	PROOF OF SERVICE by defendant Chunghwa Picture on 10/25/02 Motion to ext time to ans & to strike req for dflt and related docs served on Jeffrey N Brown Esq by mail (el) (Entered: 10/28/2002)
10/28/2002	<u>16</u>	DEFAULT ENTERED as to defendant Chunghwa Picture (cc: all counsel) (el) (Entered: 10/28/2002)
10/29/2002	<u>20</u>	MINUTES: ORDER striking dft Chunghwa Picture Tubes Ltd's motion to extend time to file an answer or to otherwise respond to the complaint [17-1], and to strike entry of default [17-2], for failure to comply with Local Rule 7-3 by Judge Consuelo B. Marshall CR: none present (el) (Entered: 10/29/2002)
11/01/2002	21	EX PARTE APPLICATION filed by defendant Chunghwa Picture for relief from default entry Lodged proposed order (pj) (Entered: 11/04/2002)
11/01/2002	22	DECLARATION of TERESA M CORBIN IN SUPPORT by defendant Chunghwa Picture re ex parte application for relief from default entry [21-1] (pj) (Entered: 11/04/2002)
11/01/2002	23	CERTIFICATE OF SERVICE by defendant Chunghwa Picture on 11/1/02 of ex parte appl for relief from default entry & supporting docs (pj) (Entered: 11/04/2002)
11/04/2002	24	MEMORANDUM OF POINTS AND AUTHORITIES filed by plaintiff LG Philips LCD Co in opposition to Chungwha Picture Tube Ltd's ex parte application for relief from default entry [21-1]; Decl of Jeffrey N Brown (el) (Entered: 11/05/2002)
11/05/2002	25	REPLY BRIEF by defendant Chunghwa Picture in support of Chunghwa Picture Tubes Inc's ex parte application for relief from default entry [21-1] (el) (Entered: 11/12/2002)
11/05/2002	26	REPLY DECLARATION of Teresa M Corbin in support by defendant Chunghwa Picture re ex parte application for relief from default entry [21-1] (el) (Entered: 11/12/2002)
11/05/2002	27	PROOF OF SERVICE by defendant Chunghwa Picture on 11/5/02 of Reply brief in suppt of ex party appl for relief from dflt entry and related docs served on Jeffrey N Brown and Jeffrey F Craft by facsimile and by mail (el) (Entered: 11/12/2002)
11/12/2002	28	REPLY DECLARATION of Jeffrey F Craft in support by defendant Chunghwa Picture to response to ex parte application for relief from default entry [21-1] (el) (Entered: 11/13/2002)

11/12/2002	29	AMENDED REPLY BRIEF in support by defendant Chunghwa Picture to ex parte application for relief from default entry [21-1] (el) (Entered: 11/13/2002)
11/12/2002	30	AMENDED REPLY DECLARATION of Teresa M Corbin in support by defendant Chunghwa Picture in support re ex parte application for relief from default entry [21-1] (el) (Entered: 11/13/2002)
11/12/2002	31	CERTIFICATE OF SERVICE by defendant Chunghwa Picture on 11/12/02 of Amended Reply brief, decl, etc (see doc for list) served on Jeffrey N Brown Esq and Jeffrey F Craft Esq by mail (el) (Entered: 11/13/2002)
11/19/2002	32	MINUTES: ORDER that dft's ex parte application for relief from default entry [21-1] is DENIED. The matter should be filed as a noticed motion. Defendant shall file a notice setting its previously stricken motion for hearing on 12/16/02 at 10:00 am; said notice shall include a stmtm in compliance with the local rule, and the specific filings related to this matter for the court's consideration for hearing. No further briefing by the parties shall be permitted. by Judge Consuelo B. Marshall CR: none present (el) (Entered: 11/20/2002)
11/25/2002	33	CERTIFICATION OF INTERESTED PARTIES filed by defendant Tatung Co Of America, defendant Tatung Company (el) (Entered: 11/25/2002)
11/25/2002	34	ANSWER filed by defendant Tatung Co Of America to complaint for patent infringement [1-1] (el) (Entered: 11/25/2002)
11/25/2002	35	ANSWER filed by defendant Tatung Company to complaint for patent infringement [1-1] (el) (Entered: 11/25/2002)
11/26/2002	36	NOTICE OF MOTION AND MOTION by defendant Chunghwa Picture for relief from dflt entry , and to extend time to answer complaint [1-1] to as to Chunghwa Picture ; motion hearing set for 10:00 12/16/02 Lodged order (el) (Entered: 11/26/2002)
11/26/2002	37	DECLARATION of Teresa M Corbin in compliance with L.R. 7-3 by defendant Chunghwa Picture re motion for relief from dflt entry [36-1], motion to extend time to answer complaint [1-1] to as to Chunghwa Picture [36-2] (el) (Entered: 11/26/2002)
11/26/2002		Text not available. (Entered: 11/26/2002)
11/26/2002	38	CERTIFICATE OF SERVICE by defendant Chunghwa Picture on 11/25/02 of Motion for relief from dflt jgm and rel docs served on Jeffrey N Brown and Jeffrey F Craft by personal delivery (el) (Entered: 11/26/2002)
11/26/2002	39	MINUTES: On the Court's own motion, mandatory status/scheduling conf is set for 11:00 2/24/03 ; Counsel shall file a Rule 26(f) discovery plan within 14 days after the conference of cnsl (see doc for fur details) by Judge Consuelo B. Marshall CR: n/a (el) (Entered: 11/27/2002)
12/16/2002	40	MINUTES: The motion of defendant Chunghwa Picture Tubes for relief

Exhibit 9

MEDIATION, PATENT, PaperDocuments

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:05-cv-00292-JJF**

LG.Philips LCD Co. Ltd. v. Tatung Company et al
Assigned to: Honorable Joseph J. Farnan, Jr.
Related Case: 1:06-cv-00726-JJF
Cause: 35:271 Patent Infringement

Date Filed: 05/13/2005
Jury Demand: Both
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

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V.

Defendant

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 ATTORNEY TO BE NOTICED

V.

Counter Defendant

LG.Philips LCD Co. Ltd.

Date Filed	#	Docket Text
05/13/2005	<u>1</u>	COMPLAINT filed with Jury Demand against Tatung Company, Tatung Company of America Inc., Chunghwa Picture Tubes Ltd., Viewsonic Corporation - Magistrate Consent Notice to Pltf. (Filing fee \$ 250, receipt number 139248.) - filed by L.G. Philips LCD Co. Ltd.. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Exhibit B# <u>3</u> Civil Cover Sheet # <u>4</u> Acknowledgement of Consent Form)(mwm,) (Entered: 05/16/2005)
05/13/2005		No Summons Issued (mwm,) (Entered: 05/16/2005)
05/13/2005	<u>2</u>	Report to the Commissioner of Patents for Patent Number(s) 6,738,121; 5,019,002; (mwm,) (Entered: 05/16/2005)
05/18/2005		Summons Issued as to Tatung Company on 5/16/2005; Tatung Company of America Inc. on 5/16/2005; Chunghwa Picture Tubes Ltd. on 5/16/2005; Viewsonic Corporation on 5/16/2005. (dab,) (Entered: 05/18/2005)
05/18/2005	<u>3</u>	SUMMONS Returned Executed by LG.Philips LCD Co. Ltd.. Tatung Company served on 5/17/2005, answer due 6/6/2005. (Kirk, Richard) (Entered: 05/18/2005)
05/18/2005	<u>4</u>	SUMMONS Returned Executed by LG.Philips LCD Co. Ltd.. Tatung Company of America Inc. served on 5/17/2005, answer due 6/6/2005. (Kirk, Richard) (Entered: 05/18/2005)
05/18/2005	<u>5</u>	SUMMONS Returned Executed by LG.Philips LCD Co. Ltd.. Chunghwa Picture Tubes Ltd. served on 5/17/2005, answer due 6/6/2005. (Kirk, Richard) (Entered: 05/18/2005)
05/18/2005	<u>6</u>	SUMMONS Returned Executed by LG.Philips LCD Co. Ltd.. Viewsonic Corporation served on 5/17/2005, answer due 6/6/2005. (Kirk, Richard) (Entered: 05/18/2005)
05/25/2005		Case assigned to Judge Joseph J. Farnan, Jr. Please include the initials of the Judge (JJF) after the case number on all documents filed. (rjb,) (Entered: 05/25/2005)
05/27/2005	<u>7</u>	ACKNOWLEDGEMENT OF SERVICE Executed <i>Notice of Service on Defendant Tatung Company of America Inc. Pursuant to 10 Del. C. Sec. 3104</i> Acknowledgement filed by LG.Philips LCD Co. Ltd.. (Attachments: # <u>1</u> Exhibit A - C)(Kirk, Richard) (Entered: 05/27/2005)
06/02/2005	<u>8</u>	STATEMENT <i>Plaintiff's Rule 7.1 Disclosure Statement</i> by LG.Philips

		LCD Co. Ltd.. (Kirk, Richard) (Entered: 06/02/2005)
06/10/2005	<u>9</u>	STIPULATION TO EXTEND TIME answer or otherwise respond to the Complaint to September 2, 2005 - filed by Tatung Company, Tatung Company of America Inc., Chunghwa Picture Tubes Ltd., Viewsonic Corporation. (Whetzel, Robert) (Entered: 06/10/2005)
06/13/2005		SO ORDERED, re <u>9</u> STIPULATION TO EXTEND TIME answer or otherwise respond to the Complaint to September 2, 2005 filed by Tatung Company, Tatung Company of America Inc., Chunghwa Picture Tubes Ltd., Viewsonic Corporation . Signed by Judge Joseph J. Farnan, Jr. on 06/13/05. (afb,) (Entered: 06/14/2005)
06/13/2005		Set/Reset Deadlines: Tatung Company answer due 9/2/2005; Tatung Company of America Inc. answer due 9/2/2005; Chunghwa Picture Tubes Ltd. answer due 9/2/2005; Viewsonic Corporation answer due 9/2/2005 per D.I. 9. (afb,) (Entered: 06/14/2005)
06/23/2005	<u>10</u>	ACKNOWLEDGEMENT OF SERVICE Executed <i>Notice of Service on Defendant Tatung Company Pursuant to 10 Del. C. Section 3104</i> Acknowledgement filed by LG.Philips LCD Co. Ltd.. (Attachments: # <u>1</u> Exhibit A# <u>2</u> Exhibit B# <u>3</u> Exhibit C)(Kirk, Richard) (Entered: 06/23/2005)
09/02/2005	<u>11</u>	MOTION for Pro Hac Vice Appearance of Attorney Thomas W. Jenkins, Jr. and Christine A. Dudzik - filed by Tatung Company, Tatung Company of America Inc., Chunghwa Picture Tubes Ltd., Viewsonic Corporation. (King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>12</u>	ANSWER to Complaint with Jury Demand, COUNTERCLAIM against LG.Philips LCD Co. Ltd. by Chunghwa Picture Tubes Ltd..(King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>13</u>	Disclosure Statement pursuant to Rule 7.1 filed by Chunghwa Picture Tubes Ltd. identifying Chunghwa Electronic Investment Company as Corporate Parent. (King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>14</u>	ANSWER to Complaint with Jury Demand, COUNTERCLAIM against LG.Philips LCD Co. Ltd. by Tatung Company, Tatung Company of America Inc..(King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>15</u>	Disclosure Statement pursuant to Rule 7.1 filed by Tatung Company, Tatung Company of America Inc.. (King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>16</u>	ANSWER to Complaint with Jury Demand, COUNTERCLAIM against LG.Philips LCD Co. Ltd. by Viewsonic Corporation.(King, Matthew) (Entered: 09/02/2005)
09/02/2005	<u>17</u>	Disclosure Statement pursuant to Rule 7.1 filed by Viewsonic Corporation. (King, Matthew) (Entered: 09/02/2005)
09/12/2005		SO ORDERED, re <u>11</u> MOTION for Pro Hac Vice Appearance of Attorney Thomas W. Jenkins, Jr. and Christine A. Dudzik filed by Tatung Company, Tatung Company of America Inc., Chunghwa Picture Tubes Ltd., Viewsonic Corporation . Signed by Judge Joseph J. Farnan, Jr. on